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Attorneys for Defendants  
MoneyMutual, LLC, Selling Source, LLC, Montel Brian Anthony  
Williams, Glenn McKay, PartnerWeekly, LLC, John Hashman,  
Brian Rauch, Samuel W. Humphreys, Douglas Tulley, and  
Alton F. Irby III

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
(OAKLAND DIVISION)

SEAN L. GILBERT, KEEYA MALONE,  
KIMBERLY BILBREW, CHARMAINE B.  
AQUINO, on behalf of themselves and all  
persons similarly situated,

Plaintiffs,

v.

BANK OF AMERICA, N.A., et al.,  
Defendants.

Case No. 4:13-cv-01171-JSW

**DECLARATION OF DONALD J.  
PUTTERMAN IN SUPPORT OF THE  
MONEYMUTUAL DEFENDANTS' AND  
MONTEL WILLIAMS' OPPOSITION  
TO PLAINTIFFS' MOTION TO  
CERTIFY CLASSES**

**Date: January 8, 2016**

**Time: 9:00 A.M.**

**Dept. 5**

**Hon. Judge S. White, District Judge**

1 I, DONALD J. PUTTERMAN, declare:

2 1. I am an active member in good standing of the State Bar of California and a partner at  
3 the law firm of Putterman Logan LLP, attorneys for MoneyMutual, LLC, Selling Source, LLC, Glenn  
4 McKay, PartnerWeekly, LLC, LLC, Brian Rauch; John Hashman, Samuel W. Humphreys, and Alton  
5 Irby III ("the MoneyMutual Defendants"); and Montel Williams, in the above-captioned action. I  
6 have personal knowledge of the facts stated in this declaration and if necessary could and would  
7 testify competently under oath thereto.

8 2. Attached hereto as **Exhibit A** is a true and correct copy of excerpts from the  
9 deposition of Keeya Malone. I attended and took the deposition on November 23, 2015.

10 3. Attached hereto as **Exhibit B** is a true and correct copy of excerpts from the  
11 deposition of Charmaine Aquino. I attended and took the deposition on November 24, 2015.

12 4. Attached hereto as **Exhibit C** is a true and correct copy of excerpts from the  
13 deposition of Kimberly Bilbrew. I attended and took the deposition on November 24, 2015.

14 5. Attached hereto as **Exhibit D** is a true and correct copy of excerpts from the  
15 deposition of Sean L. Gilbert. I attended and took the deposition on December 1, 2015.

16 6. Attached hereto as **Exhibit E** is a true and correct copy of the document marked as  
17 Deposition Exhibit 1.

18 7. Attached hereto as **Exhibit F** is a true and correct copy of the document marked as  
19 Deposition Exhibit 2.

20 8. Attached hereto as **Exhibit G** is a true and correct copy of the document marked as  
21 Deposition Exhibit 3.

22 9. Attached hereto as **Exhibit H** is a true and correct copy of the document marked as  
23 Deposition Exhibit 4.

24 10. Attached hereto as **Exhibit I** is a true and correct copy of the document marked as  
25 Deposition Exhibit 5.

26 11. Attached hereto as **Exhibit J** is a true and correct copy of the document marked as  
27 Deposition Exhibit 6.  
28

12. Attached hereto as Exhibit K is a true and correct copy of the document marked as Deposition Exhibit 8.

13. Attached hereto as Exhibit L is a true and correct copy of the document marked as Deposition Exhibit 10.

14. Attached hereto as Exhibit M is a true and correct copy of the document marked as Deposition Exhibit 14.

15. Attached hereto as Exhibit N is a true and correct copy of the document marked as Deposition Exhibit 16.

16. Attached hereto as Exhibit O is a true and correct copy of the document marked as Deposition Exhibit 17.

17. Attached hereto as Exhibit P is a true and correct copy of the document marked as Deposition Exhibit 18.

18. Attached hereto as Exhibit Q is a true and correct copy of the document marked as Deposition Exhibit 19.

19. Attached hereto as Exhibit R is a true and correct copy of the document marked as Deposition Exhibit 20.

20. Attached hereto as Exhibit S is a true and correct copy of the document marked as Deposition Exhibit 21.

21. Attached hereto as Exhibit T is a true and correct copy of the document marked as Deposition Exhibit 36.

22. Attached hereto as Exhibit U is a true and correct copy of the document marked as Deposition Exhibit 37.

23. Attached hereto as Exhibit V is a true and correct copy of the document marked as Deposition Exhibit 38.

24. Attached hereto as Exhibit W is a true and correct copy of the document marked as Deposition Exhibit 39.

25. Attached hereto as **Exhibit X** is a true and correct copy of the document marked as Deposition Exhibit 40.

26. Attached hereto as **Exhibit Y** is a true and correct copy of the document marked as Deposition Exhibit 41.

27. Attached hereto as **Exhibit Z** is a true and correct copy of the document marked as Deposition Exhibit 43.

28. Attached hereto as **Exhibit AA** is a true and correct copy of the document marked as Deposition Exhibit 50.

29. Attached hereto as **Exhibit BB** is a true and correct copy of the document marked as Deposition Exhibit 51.

30. Attached hereto as **Exhibit CC** is a true and correct copy of the document marked as Deposition Exhibit 52.

31. Attached hereto as **Exhibit DD** is a true and correct copy of the document marked as Deposition Exhibit 53.

32. Attached hereto as **Exhibit EE** is a true and correct copy of the document marked as Deposition Exhibit 54.

33. Attached hereto as **Exhibit FF** is a true and correct copy of the document marked as Deposition Exhibit 55.

34. Attached hereto as **Exhibit GG** is a true and correct copy of the document marked as Deposition Exhibit 57.

35. Attached hereto as **Exhibit HH** is a true and correct copy of the document marked as Deposition Exhibit 58.

36. Attached hereto as **Exhibit II** is a true and correct copy of the document marked as Deposition Exhibit 59.

37. Attached hereto as **Exhibit JJ** is a true and correct copy of the document marked as Deposition Exhibit 61.

38. Attached hereto as **Exhibit KK** is a true and correct copy of the document marked as Deposition Exhibit 65.

39. Attached hereto as **Exhibit LL** is a true and correct copy of the document marked as Deposition Exhibit 66.

40. Attached hereto as **Exhibit MM** is a true and correct copy of the document marked as Deposition Exhibit 67.

41. Attached hereto as **Exhibit NN** is a true and correct copy of the document marked as Deposition Exhibit 70.

42. Attached hereto as **Exhibit OO** is a true and correct copy of the document marked as Deposition Exhibit 71.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed on December 18, 2015

/s/ DONALD J. PUTTERMAN

Donald J. Putterman